



September 5, 2001

Mr. Neal Parece
Project Director
Constellation Power Source Generation, Inc.
111 Marketplace, Suite 200
Baltimore, MD 21202

SUBJECT: Approval of Requests for Site Arrangement and Equipment Changes
(97-AFC-1C)

Dear Mr. Parece:

California Energy Commission staff have reviewed your requests of June 13, 2001, and July 30, 2001, to change the site configuration and equipment for the High Desert Power Project. The requested changes are:

- Reconfigure the cooling towers from three towers to one;
- Add a diesel fire-water pump engine;
- Relocate the ammonia storage tank;
- Change the ammonia storage tank back to the original double walled design;
and
- Make other minor changes resulting from a more detailed engineering design.

The only Conditions of Certification that are affected are Conditions AQ-32 and HAZ-5. Your requested changes have been approved by the U.S. Environmental Protection Agency and the Mojave Desert Air Quality Management District.

As directed by Governor's Executive Order D-25-01, concerning expediting post-certification amendments, we have expedited review of this proposed project modification because statutes and implementing regulations that normally apply to review and approval of this amendment have been suspended. Energy Commission staff have analyzed and concluded that these modifications have no potential for adverse environmental or public health and safety impacts. Therefore, you are authorized to proceed with the project modifications as requested. A copy of this letter will be posted on the Energy Commission website at www.energy.ca.gov, and we will file a California Environmental Quality Act Notice of Exemption with the State Clearinghouse.

The following is the revised language of Conditions of Certification AQ-32 and HAZ-5 (new wording shown double underlined, deleted wording shown with strikeout).

AQ-32 The drift rate shall not exceed 0.0006 percent with a maximum circulation rate of ~~57,300~~ 191,655 gallons per minute. The maximum hourly PM10 emissions rate shall not exceed ~~4.4~~ 1.2 pounds per hour, as calculated per the written District-approved protocol.

Verification: See condition AQ-20 and its verification.

HAZ-5 The project owner shall design the aqueous ammonia storage facility to ensure that the ammonia concentration does not exceed 75 ppm at the fence line in the event of a release by meeting the following criteria:

1. A vertically mounted double-walled ~~fully enclosed single-walled~~ ammonium hydroxide storage tank of no more than 50,000 gallons in capacity, which ~~provides a minimum interstitial space of two feet between the protective structure and the tank. Both the tank and enclosure building~~ shall be designed to UBC Seismic Zone 4 and API 650 standards Section VIII, Div. 1 of the ASME Boiler and Pressure Vessel Code.
2. A liquid-tight diked area around the tank capable of containing the entire 50,000 gallons of aqueous ammonia plus 10%.
3. A loading area such that any aqueous ammonia spilled there will drain into an underground sump capable of containing one entire truck delivery plus 10%.

Verification: At least sixty (60) days prior to the initial delivery of aqueous ammonia, the project owner shall provide designs for the aqueous ammonia storage facility as described in this Condition of Certification to the CPM for approval.

If you have any questions, please contact Steve Munro, Compliance Project Manager, at (916) 654-3936, or by e-mail at smunro@energy.state.ca.us.

Sincerely,

ROBERT L. THERKELSEN, Deputy Director
Systems Assessment & Facilities Siting